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Attorneys for Defendants Las Vegas Metropolitan Police Department,
Lieutenant Kurt McKenzie, Officer Tabatha Dickson, Captain Patricia
Spencer, Captain Dori Koren, Officer Evan Spoon and Officer Jordan Turner

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LANCE DOWNES-COVINGTON, an
individual, SOLDADERA SANCHEZ, an
individual, ROBERT O'BRIEN, an
individual, EMILY DRISCOLL, an
individual, ALISON KENADY, an
individual, TENISHA MARTIN, an
individual, GABRIELA MOLINA, an
individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
LIEUTENANT KURT MCKENZIE, as an
individual and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
OFFICER TABATHA DICKSON, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN PATRICIA SPENCER, as an
individual and in her capacity as a Las Vegas
Metropolitan Police Department Officer;
CAPTAIN DORI KOREN, as an individual
and in his capacity as a Las Vegas
Metropolitan Police Department Officer;
EVAN SPOON, as an individual and in his
capacity as a Las Vegas Metropolitan Police
Department Officer; JORDAN TURNER, as
an individual and in his capacity as a Las
Vegas Metropolitan Police Department
Officer; UNKNOWN OFFICERS 1-14, as
individuals and in their capacity as Las Vegas
Metropolitan Police Department Officers,

Defendants.

Case Number:
2:20-cv-01790-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN AND
SCHEDULING ORDER DEADLINES
(FOURTEENTH REQUEST)**

**STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN AND
SCHEDULING ORDER DEADLINES (TWELFTH REQUEST)**

Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through their attorneys of record, Margaret A. McLetchie, Esq., Leo S. Wolpert, Esq., and Pieter M. O'Leary, Esq., with the law firm of McLetchie Law and Defendants, the Las Vegas Metropolitan Police Department (the "Department" or "LVMPD"), Lieutenant Kurt McKenzie ("McKenzie"), Officer Tabatha Dickson ("Dickson"), Captain Patricia Spencer ("Spencer"), Captain Dori Koren ("Koren"), Officer Evan Spoon ("Spoon"), and Officer Jordan Turner ("Turner"), collectively ("LVMPD Defendants"), by and through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach, hereby stipulate and agree to extend the Discovery Plan and Scheduling Order deadlines an additional sixty (60) days. This Stipulation is being entered in good faith and not for purposes of delay (supplemented information noted in **bold-face** type).

I. STATUS OF DISCOVERY.

A. PLAINTIFFS' DISCOVERY.

1. Plaintiffs' Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2021;
2. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
3. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
4. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
5. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;
6. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Interrogatories dated May 13, 2021;

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1 7. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Interrogatories
2 dated May 13, 2021;

3 8. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Interrogatories
4 dated May 13, 2021;

5 9. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of
6 Requests for Production of Documents dated May 13, 2021;

7 10. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Requests
8 for Production of Documents dated May 13, 2021;

9 11. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Requests for
10 Production of Documents dated May 13, 2021;

11 12. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Requests for
12 Production of Documents dated May 13, 2021;

13 13. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Requests for
14 Production of Documents dated May 13, 2021;

15 14. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Requests for
16 Production of Documents dated May 13, 2021;

17 15. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Requests for
18 Production of Documents dated May 13, 2021;

19 16. Plaintiff Lance Downes-Covington's First Set of Interrogatories to LVMPD
20 dated June 2, 2021;

21 17. Plaintiffs' First Set of Requests for Production of Documents to LVMPD dated
22 June 2, 2021;

23 18. Plaintiff Emily Driscoll's First Set of Interrogatories to LVMPD dated July 1,
24 2021;

25 19. Plaintiffs' First Supplement to Initial Disclosure of Witnesses and Documents
26 Pursuant to FRCP 26.1(a)(1) dated July 1, 2021;

27 20. Plaintiffs' Second Supplement to Initial Disclosure of Witnesses and
28 Documents Pursuant to FRCP 26.1(a)(1) dated July 8, 2021;

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21. Plaintiffs' Third Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated July 12, 2021;

22. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

23. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

24. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

25. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of Interrogatories dated July 8, 2021;

26. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of Interrogatories dated June 8, 2021;

27. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

28. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

29. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

30. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

31. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

32. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 8, 2021;

33. Plaintiff Gabriela Molina's Second Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 12, 2021;

34. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's First Set of Requests for Production of Documents dated July 12, 2021;

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1 35. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set of
2 Interrogatories dated July 12, 2021;

3 36. Plaintiff Lance Downes-Covington's Supplemental Responses to LVMPD's
4 First Set of Interrogatories dated July 12, 2021;

5 37. Plaintiff Tenisha Martin's First Set of Interrogatories to LVMPD dated July
6 13, 2021;

7 38. Plaintiffs' Second Set of Requests for Production of Documents to LVMPD
8 dated July 13, 2021;

9 39. Plaintiff Tenisha Martin's Second Set of Interrogatories to LVMPD dated July
10 14, 2021;

11 40. Plaintiffs' Third Set of Requests for Production of Documents to LVMPD
12 dated July 14, 2021;

13 41. Plaintiffs' Fourth Supplement to Initial Disclosure of Witnesses and
14 Documents Pursuant to FRCP 26.1(a)(1) dated September 15, 2021;

15 42. Plaintiff Tenisha Martin's Third Set of Interrogatories to LVMPD dated
16 September 15, 2021;

17 43. Plaintiffs' Fourth Set of Requests for Production of Documents to LVMPD
18 dated September 15, 2021;

19 44. Plaintiffs' First Set of Requests for Admission to LVMPD dated September
20 17, 2021;

21 45. Tenisha Martin's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
22 dated December 16, 2021;

23 46. Soldadera Sanchez's Responses to Lt. Kurt McKenzie's First Set of
24 Interrogatories dated December 16, 2021;

25 47. Robert O' Brien's Responses to Lt. Kurt McKenzie's First Set of
26 Interrogatories dated December 16, 2021;

27 48. Lance Downes-Covington's Responses to Lt. Kurt McKenzie's First Set of
28 Interrogatories dated December 16, 2021;

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1 49. Gabriela Molina's Responses to Lt. Kurt McKenzie's First Set of
2 Interrogatories dated December 16, 2021;

3 50. Emily Driscoll's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
4 dated December 16, 2021;

5 51. Alison Kenady's Responses to Lt. Kurt McKenzie's First Set of Interrogatories
6 dated December 16, 2021;

7 52. Tenisha Martin's Responses to LVMPD's First Set of Requests for Admissions
8 dated December 16, 2021;

9 53. Soldadera Sanchez's Responses to LVMPD's First Set of Requests for
10 Admissions dated December 16, 2021;

11 54. Robert O'Brien's Responses to LVMPD's First Set of Requests for
12 Admissions dated December 16, 2021;

13 55. Lance Downes-Covington's Responses to LVMPD's First Set of Requests for
14 Admissions dated December 16, 2021;

15 56. Gabriela Molina's Responses to LVMPD's First Set of Requests for
16 Admissions dated December 16, 2021;

17 57. Emily Driscoll's Responses to LVMPD's First Set of Requests for Admissions
18 dated December 16, 2021;

19 58. Alison Kenady's Responses to LVMPD's First Set of Requests for Admissions
20 dated December 16, 2021;

21 59. Alison Kenady's First Set of Interrogatories to LVMPD dated April 1, 2022;

22 60. Emily Driscoll's Second Set of Interrogatories to LVMPD dated April 1, 2022;

23 61. Gabriella Molina's First Set of Interrogatories to LVMPD dated April 1, 2022;

24 62. Lance Downes-Covington's Second Set of Interrogatories to LVMPD dated
25 April 1, 2022;

26 63. Plaintiffs' Fifth Set of Requests for Production of Documents to LVMPD dated
27 April 1, 2022;

28 64. Robert O'Brien's First Set of Interrogatories to LVMPD dated April 1, 2022;

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- 1 65. Plaintiffs' Second Set of Requests for Admissions to LVMPD dated April 1,
- 2 2022;
- 3 66. Sol Sanchez's First Set of Interrogatories to LVMPD dated April 1, 2022;
- 4 67. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe
- 5 Lombardo [Request Nos. 1-5] dated June 17, 2022;
- 6 68. Plaintiffs' First Set of Requests for Admissions to Defendant Tabatha Dickson
- 7 dated June 17, 2022;
- 8 69. Plaintiffs' First Set of Requests for Production of Documents to Defendant Joe
- 9 Lombardo [Request Nos. 1-4] dated June 17, 2022;
- 10 70. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 17,
- 11 2022;
- 12 71. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 17,
- 13 2022;
- 14 72. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 17, 2022;
- 15 73. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June
- 16 17, 2022;
- 17 74. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD
- 18 dated June 17, 2022;
- 19 75. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 17,
- 20 2022;
- 21 76. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 17, 2022;
- 22 77. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha
- 23 Dickson dated June 17, 2022;
- 24 78. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June
- 25 17, 2022;
- 26 79. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated
- 27 June 17, 2022;
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- 1 80. Plaintiffs' First Set of Requests for Production of Documents to Defendant
- 2 Patricia Spencer dated June 17, 2022;
- 3 81. Plaintiffs' First Set of Requests for Production of Documents to Defendant
- 4 Dori Koren dated June 17, 2022;
- 5 82. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo
- 6 [Request No. 1] dated June 17, 2022;
- 7 83. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt
- 8 McKenzie dated June 17, 2022;
- 9 84. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated June
- 10 17, 2022;
- 11 85. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 21,
- 12 2022;
- 13 86. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD
- 14 dated June 21, 2022;
- 15 87. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 21, 2022;
- 16 88. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated June
- 17 21, 2022;
- 18 89. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 21,
- 19 2022;
- 20 90. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated
- 21 June 21, 2022;
- 22 91. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated June
- 23 21, 2022;
- 24 92. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June 21,
- 25 2022;
- 26 93. Plaintiffs' First Set of Requests for Admissions to Officer Tabatha Dickson
- 27 dated June 21, 2022;
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1 94. Plaintiffs' First Set of Requests for Production of Documents to Joe Lombardo
2 [Request Nos. 1-5] dated June 21, 2022;

3 95. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt
4 McKenzie dated June 21, 2022;

5 96. Plaintiffs' First Set of Requests for Production of Documents to Officer
6 Tabatha Dickson dated June 21, 2022;

7 97. Plaintiffs' First Set of Requests for Production of Documents to Patricia
8 Spencer dated June 21, 2022;

9 98. Plaintiffs' First Set of Requests for Production of Documents to Captain Dori
10 Koren dated June 21, 2022;

11 99. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha
12 Dickson dated June 21, 2022;

13 100. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated June
14 21, 2022;

15 101. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 21, 2022;

16 102. Plaintiff Emily Driscoll's Requests for Admissions to LVMPD - Set One dated
17 October 27, 2022.

18 103. Plaintiff Emily Driscoll's Interrogatories to LVMPD - Set Four dated October
19 27, 2022.

20 104. Plaintiff Emily Driscoll's Interrogatories to Tabatha Dickson - Set One dated
21 October 27, 2022.

22 105. Plaintiff Emily Driscoll's Requests for Production of Documents to LVMPD -
23 Set One dated October 27, 2022.

24 106. Plaintiff Emily Driscoll's Requests for Production of Documents to Tabatha
25 Dickson - Set One dated October 27, 2022.

26 107. Plaintiff Emily Driscoll's Requests for Admissions to Tabatha Dickson - Set
27 One dated October 27, 2022.

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1 108. Plaintiff Gabriela Molina's Interrogatories to LVMPD - Set Two dated
2 October 27, 2022.

3 109. Plaintiff Gabriela Molina's Interrogatories to Tabatha Dickson - Set One dated
4 October 27, 2022.

5 110. Plaintiff Gabriela Molina's Requests for Production of Documents to LVMPD
6 - Set One dated October 27, 2022.

7 111. Plaintiff Gabriela Molina's Requests for Production of Documents to Tabatha
8 Dickson - Set One dated October 27, 2022.

9 112. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set One
10 dated October 27, 2022.

11 113. Plaintiff Gabriela Molina's Requests for Admissions to Tabatha Dickson - Set
12 One dated October 27, 2022.

13 114. Plaintiff Lance Downes-Covington's Interrogatories to LVMPD - Set Four
14 dated October 27, 2022.

15 115. Plaintiff Lance Downes-Covington's Interrogatories to Tabatha Dickson - Set
16 Two dated October 27, 2022.

17 116. Plaintiff Lance Downes-Covington's Interrogatories to Jordan Turner - Set
18 One dated October 27, 2022.

19 117. Plaintiff Lance Downes-Covington's Requests for Production of Documents
20 to LVMPD - Set One dated October 27, 2022.

21 118. Plaintiff Lance Downes-Covington's Requests for Production of Documents
22 to Tabatha Dickson - Set One dated October 27, 2022.

23 119. Plaintiff Lance Downes-Covington's Requests for Production of Documents
24 to Jordan Turner - Set One dated October 27, 2022.

25 120. Plaintiff Lance Downes-Covington's Requests for Admissions to LVMPD -
26 Set One dated October 27, 2022.

27 121. Plaintiff Lance Downes-Covington's Requests for Admissions to Tabatha
28 Dickson - Set One dated October 27, 2022.

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122. Plaintiff Lance Downes-Covington's Requests for Admissions to Jordan Turner - Set One dated October 27, 2022.

123. Soldadera Sanchez's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

124. Soldadera Sanchez's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

125. Robert O'Brien's Interrogatories to LVMPD - Set One dated November 7, 2022.

126. Robert O'Brien's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

127. Robert O'Brien's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

128. Alison Kenady's Interrogatories to LVMPD - Set Two dated November 7, 2022.

129. Alison Kenady's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

130. Alison Kenady's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

131. Tenisha Martin's Requests for Production of Documents to LVMPD - Set One dated November 7, 2022.

132. Tenisha Martin's Requests for Admissions to LVMPD - Set One dated November 7, 2022.

133. Plaintiffs' Fifth Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 4, 2023;

134. Plaintiffs' Sixth Supplement to Initial Disclosure of Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2023.

135. Tenisha Martin's Requests for Production of Documents to LVMPD - Set Two, dated January 17, 2023.

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1 136. Tenisha Martin's Requests for Production of Documents to LVMPD – Set
2 Three, dated April 18, 2023.

3 137. Plaintiff Lance Downes-Covington's Requests for Production to LVMPD - Set
4 Two dated May 16, 2023.

5 138. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set Two
6 dated June 14, 2023.

7 **139. Plaintiffs' Eighth Supplemental Disclosure of Witnesses and Documents**
8 **Pursuant to FRCP 26.1(a)(1) dated January 30, 2024.**

9 **B. DEFENDANTS' DISCOVERY.**

10 1. LVMPD Defendants' Initial Disclosure of Witnesses and Documents Pursuant
11 to FRCP 26.1(a)(1) dated January 20, 2021.

12 2. LVMPD's First Set of Interrogatories to Plaintiff Lance Downes-Covington
13 dated March 12, 2021.

14 3. LVMPD's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated
15 March 12, 2021.

16 4. LVMPD's First Set of Interrogatories to Plaintiff Robert O'Brien dated March
17 12, 2021.

18 5. LVMPD's First Set of Interrogatories to Plaintiff Emily Driscoll dated March
19 12, 2021.

20 6. LVMPD's First Set of Interrogatories to Plaintiff Alison Kenady dated March
21 12, 2021.

22 7. LVMPD's First Set of Interrogatories to Plaintiff Tenisha Martin dated March
23 12, 2021.

24 8. LVMPD's First Set of Interrogatories to Plaintiff Gabriela Molina dated March
25 12, 2021.

26 9. LVMPD's First Set of Request for Production of Documents to Plaintiff Lance
27 Downes-Covington dated March 12, 2021.

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1 10. LVMPD's First Set of Request for Production of Documents to Plaintiff
2 Soldadera Sanchez dated March 12, 2021.

3 11. LVMPD's First Set of Request for Production of Documents to Plaintiff Robert
4 O'Brien dated March 12, 2021.

5 12. LVMPD's First Set of Request for Production of Documents to Plaintiff Emily
6 Driscoll dated March 12, 2021.

7 13. LVMPD's First Set of Request for Production of Documents to Plaintiff Alison
8 Kenady dated March 12, 2021.

9 14. LVMPD's First Set of Request for Production of Documents to Plaintiff
10 Tenisha Martin dated March 12, 2021.

11 15. LVMPD's First Set of Request for Production of Documents to Plaintiff
12 Gabriela Molina dated March 12, 2021.

13 16. LVMPD Defendants' First Supplement to Initial Disclosures of Witnesses and
14 Documents Pursuant to FRCP 26.1(a)(1) dated July 20, 2021.

15 17. LVMPD's Answers to Plaintiff Lance Downes-Covington's First Set of
16 Interrogatories dated July 20, 2021.

17 18. LVMPD's Responses to Plaintiffs' First Set of Requests for Production of
18 Documents dated July 20, 2021.

19 19. LVMPD's Responses to Plaintiff Emily Driscoll's First Set of Interrogatories
20 dated August 3, 2021.

21 20. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's
22 First Set of Interrogatories dated August 3, 2021.

23 21. LVMPD's Supplemental Responses to Plaintiffs' First Set of Requests for
24 Production of Documents dated August 3, 2021.

25 22. LVMPD Defendants' Second Supplement to Initial Disclosures of Witnesses
26 and Documents Pursuant to FRCP 26.1(a)(1) dated August 4, 2021.

27 23. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's
28 First Set of Interrogatories dated August 9, 2021.

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1 24. LVMPD Defendants' Third Supplement to Initial Disclosures of Witnesses
2 and Documents Pursuant to FRCP 26.1(a)(1) dated August 16, 2021.

3 25. LVMPD's Responses to Plaintiff Tenisha Martin's First Set of Interrogatories
4 dated August 16, 2021.

5 26. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of
6 Interrogatories dated August 16, 2021.

7 27. LVMPD's Responses to Plaintiffs' Third Set of Requests for Production of
8 Documents dated August 16, 2021.

9 28. LVMPD's Responses to Plaintiffs' Second Set of Requests for Production of
10 Documents dated August 30, 2021.

11 29. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of
12 Interrogatories dated August 30, 2021.

13 30. LVMPD Defendants' Fourth Supplement to Initial Disclosures of Witnesses
14 and Documents Pursuant to FRCP 26.1(a)(1) dated August 30, 2021.

15 31. LVMPD Defendants' Privilege Log dated August 30, 2021.

16 32. LVMPD's Amended Responses to Plaintiffs' Third Set of Requests for
17 Production of Documents dated September 13, 2021.

18 33. LVMPD's Amended Responses to Plaintiffs' Second Set of Requests for
19 Production of Documents dated September 13, 2021.

20 34. LVMPD's Amended Responses to Plaintiff Tenisha Martin's Second Set of
21 Interrogatories dated September 13, 2021.

22 35. LVMPD's Amended Responses to Plaintiff Emily Driscoll's First Set of
23 Interrogatories dated September 13, 2021.

24 36. Lt. McKenzie's First Set of Interrogatories to Plaintiff Lance Downes-
25 Covington dated September 22, 2021.

26 37. Lt. McKenzie's First Set of Interrogatories to Plaintiff Soldadera Sanchez
27 dated September 22, 2021.

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1 38. Lt. McKenzie's First Set of Interrogatories to Plaintiff Robert O'Brien dated
2 September 22, 2021.

3 39. Lt. McKenzie's First Set of Interrogatories to Plaintiff Emily Driscoll dated
4 September 22, 2021.

5 40. Lt. McKenzie's First Set of Interrogatories to Plaintiff Alison Kenady dated
6 September 22, 2021.

7 41. Lt. McKenzie's First Set of Interrogatories to Plaintiff Tenisha Martin dated
8 September 22, 2021.

9 42. Lt. McKenzie's First Set of Interrogatories to Plaintiff Gabriela Molina dated
10 September 22, 2021.

11 43. LVMPD's First Set of Requests for Admission to Plaintiff Lance Downes-
12 Covington dated September 22, 2021.

13 44. LVMPD's First Set of Requests for Admission to Plaintiff Soldadera Sanchez
14 dated September 22, 2021.

15 45. LVMPD's First Set of Requests for Admission to Plaintiff Robert O'Brien
16 dated September 22, 2021.

17 46. LVMPD's First Set of Requests for Admission to Plaintiff Emily Driscoll
18 dated September 22, 2021.

19 47. LVMPD's First Set of Requests for Admission to Plaintiff Alison Kenady
20 dated September 22, 2021.

21 48. LVMPD's First Set of Requests for Admission to Plaintiff Tenisha Martin
22 dated September 22, 2021.

23 49. LVMPD's First Set of Requests for Admission to Plaintiff Gabriela Molina
24 dated September 22, 2021.

25 50. LVMPD Defendants' Fifth Supplement to Initial Disclosures of Witnesses and
26 Documents Pursuant to FRCP 26.1(a)(1) dated October 11, 2021.

27 51. LVMPD's Responses to Plaintiffs' Fourth Set of Requests for Production of
28 Documents dated October 18, 2021.

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1 52. LVMPD's Responses to Plaintiff Tenisha Martin's Third Set of Interrogatories
2 dated October 18, 2021.

3 53. LVMPD's Responses to Plaintiffs' First Set of Requests Admission dated
4 October 20, 2021.

5 54. LVMPD's Answers to Plaintiff Lance Downes-Covington's Second Set of
6 Interrogatories dated May 5, 2022.

7 55. LVMPD's Answers to Plaintiff Alison Kenady's First Set of Interrogatories
8 dated May 5, 2022.

9 56. LVMPD's Answers to Plaintiff Robert O'Brien's First Set of Interrogatories
10 dated May 5, 2022.

11 57. LVMPD's Answers to Plaintiff Sol Sanchez's First Set of Interrogatories dated
12 May 5, 2022.

13 58. LVMPD's Responses to Plaintiffs' Fifth Set of Requests for Production of
14 Documents dated May 5, 2022.

15 59. LVMPD's Answers to Plaintiff Emily Driscoll's Second Set of Interrogatories
16 dated May 5, 2022.

17 60. LVMPD's Answers to Plaintiff Gabriella Molina's First Set of Interrogatories
18 dated May 5, 2022.

19 61. LVMPD's Responses to Plaintiffs' Second Set of Requests for Admissions
20 dated May 5, 2022.

21 62. LVMPD's Second Supplemental Answers to Plaintiff Lance Downes-
22 Covington's First Set of Interrogatories dated June 24, 2022.

23 63. LVMPD's First Supplemental Responses to Plaintiffs' Second Set of Requests
24 for Production of Documents dated June 24, 2022.

25 64. LVMPD's First Supplemental Answers to Plaintiff Tenisha Martin's Second
26 Set of Interrogatories dated June 24, 2022.

27 65. LVMPD's Second Supplemental Responses to Plaintiffs' First Set of Requests
28 for Production of Documents dated June 24, 2022.

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1 66. Lt. Kurt McKenzie's Answers to Soldadera Sanchez's First Set of
2 Interrogatories dated August 8, 2022.

3 67. Lt. Kurt McKenzie's Answers to Tenisha Martin's First Set of Interrogatories
4 dated August 8, 2022.

5 68. Lt. Kurt McKenzie's Responses to Plaintiffs' First Set of Requests for
6 Production of Documents dated August 8, 2022.

7 69. Patricia Spencer's Responses to Plaintiffs' First Set of Requests for Production
8 of Documents dated August 8, 2022.

9 70. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for
10 Admissions dated August 8, 2022.

11 71. Tabatha Dickson's Answers to Lance Downes-Covington's First Set of
12 Interrogatories dated August 8, 2022.

13 72. LVMPD's Responses to Plaintiffs' Third Set of Requests for Admissions dated
14 August 8, 2022.

15 73. LVMPD's Answers to Lance Downes-Covington's Third Set of
16 Interrogatories dated August 8, 2022.

17 74. LVMPD's Answers to Soldadera Sanchez's Second Set of Interrogatories
18 dated August 8, 2022.

19 75. Captain Dori Koren's Responses to Plaintiffs' First Set of Requests for
20 Production of Documents dated August 8, 2022.

21 76. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for
22 Production of Documents dated August 8, 2022.

23 77. LVMPD's Answers to Robert O'Brien's Second Set of Interrogatories dated
24 August 8, 2022.

25 78. LVMPD's Answers to Tenisha Martin's Fourth Set of Interrogatories dated
26 August 8, 2022.

27 79. LVMPD's Responses to Plaintiffs' Sixth Set of Requests for Production of
28 Documents dated August 8, 2022.

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- 1 80. LVMPD's Answers to Emily Driscoll's Third Set of Interrogatories dated
- 2 August 8, 2022.
- 3 81. LVMPD Defendants' Sixth Supplemental FRCP 26.1 Disclosures dated
- 4 August 8, 2022.
- 5 82. LVMPD Defendants' Seventh Supplemental FRCP 26.1 Disclosures dated
- 6 December 6, 2022.
- 7 83. Jordan Turner's Responses to Lance Downes-Covington's Requests for
- 8 Production - Set One, dated December 6, 2022.
- 9 84. Jordan Turner's Responses to Lance Downes-Covington's Requests for
- 10 Admission - Set One, dated December 6, 2022.
- 11 85. Jordan Turner's Responses to Lance Downes-Covington's Interrogatories - Set
- 12 One, dated December 6, 2022.
- 13 86. Jordan Turner's Responses to Lance Downes-Covington's Requests for
- 14 Admission - Set One, dated December 6, 2022.
- 15 87. Jordan Turner's Responses to Gabriela Molina's Requests for Production - Set
- 16 One, dated December 6, 2022.
- 17 88. Tabatha Dickson's Responses to Lance Downes Covington's Requests for
- 18 Production - Set One, dated December 6, 2022.
- 19 89. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories -
- 20 Set One, dated December 6, 2022.
- 21 90. Tabatha Dickson's Responses to Lance Downes-Covington's Interrogatories -
- 22 Set Two, dated December 6, 2022.
- 23 91. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
- 24 Admission - Set One, dated December 6, 2022.
- 25 92. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
- 26 Production - Set One, dated December 6, 2022.
- 27 93. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories - Set
- 28 94. One, dated December 6, 2022.

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1 95. Tabatha Dickson's Responses to Gabriela Molina's Requests for Admission -
2 Set One, dated December 6, 2022.

3 96. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories - Set One,
4 dated December 6, 2022.

5 97. Tabatha Dickson's Responses to Gabriela Molina's Requests for Production -
6 Set One, dated December 6, 2022.

7 98. Tabatha Dickson's Responses to Emily Driscolls' Requests for Admission -
8 Set One, dated December 6, 2022.

9 99. Tabatha Dickson's Responses to Emily Driscolls' Interrogatories - Set One,
10 dated December 6, 2022.

11 100. LVMPD'S Responses to Lance Downes Covington's Requests for Production
12 - Set One, dated December 6, 2022.

13 101. LVMPD'S Responses to Lance Downes Covington's Requests for Admission
14 - Set One, dated December 6, 2022.

15 102. LVMPD'S Responses to Lance Downes Covington's Interrogatories - Set
16 Four, dated December 6, 2022.

17 103. LVMPD's Responses to Emily Driscolls' Interrogatories - Set One, dated
18 December 6, 2022.

19 104. LVMPD's Responses to Emily Driscolls' Interrogatories - Set Four, dated
20 December 6, 2022.

21 105. LVMPD's Responses to Emily Driscolls' Requests for Admission - Set One,
22 dated December 6, 2022.

23 106. LVMPD's Responses to Emily Driscolls' Requests for Production - Set One,
24 dated December 6, 2022.

25 107. LVMPD's Responses to Gabriela Molina's Interrogatories - Set Two, dated
26 December 6, 2022.

27 108. LVMPD's Responses to Gabriela Molina's Requests for Production- Set One,
28 dated December 6, 2022.

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- 1 109. LVMPD's Responses to Gabriela Molina's Requests for Admission - Set One,
- 2 dated December 6, 2022.
- 3 110. LVMPD Defendants' Eighth Supplemental FRCP 26.1 Disclosures dated
- 4 December 16, 2022.
- 5 111. LVMPD'S Responses to Tenisha Martin's Requests for Admission - Set One,
- 6 dated December 19, 2022.
- 7 112. LVMPD'S Responses to Soldadera Sanchez's Requests for Admission - Set
- 8 One, dated December 19, 2022.
- 9 113. LVMPD'S Responses to Robert O'Brien's Requests for Admission - Set One,
- 10 dated December 19, 2022.
- 11 114. LVMPD'S Responses to Alison Kenady's Requests for Admission - Set One,
- 12 dated December 19, 2022.
- 13 115. LVMPD'S Responses to Robert O'Brien's Interrogatories - Set One, dated
- 14 December 19, 2022.
- 15 116. LVMPD'S Responses to Alison Kenady's Requests for Production - Set One,
- 16 dated December 20, 2022.
- 17 117. LVMPD'S Responses to Robert O'Brien's Requests for Production - Set One,
- 18 dated December 20, 2022.
- 19 118. LVMPD's Responses to Soldadera Sanchez' Requests for Production - Set
- 20 One, dated December 20, 2022.
- 21 119. LVMPD'S Responses to Tenisha Martin's Requests for Production - Set One,
- 22 dated December 20, 2022.
- 23 120. LVMPD'S Responses to Alison Kenady's Interrogatories - Set Two, dated
- 24 January 4, 2023.
- 25 121. LVMPD'S Responses to Robert O'Brien's Interrogatories - Set Three, dated
- 26 January 4, 2023.
- 27 122. LVMPD's Ninth Supplemental Disclosure of Witnesses and Documents
- 28 Pursuant to FRCP 26.1(a)(1), dated February 16, 2023.

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1 123. LVMPD's First Supplemental Answers to Plaintiff Robert O'Brien's First Set
2 of Interrogatories, dated February 16, 2023.

3 124. LVMPD's First Supplemental Answers to Plaintiff Soldadera Sanchez's
4 Second Set of Interrogatories, dated February 16, 2023.

5 125. LVMPD's Third Supplemental Responses to Plaintiffs' First Set of Requests
6 for Production of Documents, dated February 16, 2023.

7 126. LVMPD's Second Supplemental Responses to Plaintiff's Second Set of
8 Requests for Production of Documents, dated February 16, 2023.

9 127. LVMPD's First Supplemental Responses to Plaintiffs' Sixth Set of Requests
10 for Production of Documents, dated February 16, 2023.

11 128. LVMPD'S Responses to Plaintiff Tenisha Martin's Requests for Production of
12 Documents - Set One [sic Set Two], dated February 16, 2023.

13 129. LVMPD's Tenth Supplemental Disclosure of Witnesses and Documents
14 Pursuant to FRCP 26.1(a)(1), dated February 24, 2023.

15 130. LVMPD's Responses to Tenisha Martin's Requests for Production of
16 Documents - Set Three dated May 22, 2023.

17 131. LVMPD's Responses to Gabriela Molina's Requests for Admissions - Set Two
18 dated July 17, 2023.

19 132. LVMPD's Responses to Lance Downes-Covington's Requests for Production
20 of Documents - Set Two dated July 17, 2023.

21 133. LVMPD's Eleventh Supplemental Disclosure of Witnesses and Documents
22 Pursuant to FRCP 26.1(a)(1), dated July 17, 2023.

23 **C. DEPOSITIONS.**

24 1. LVMPD Defendants deposed Plaintiff Alison Kenady on August 9, 2022.

25 2. LVMPD Defendants deposed Plaintiff Gabriela Molina on August 10, 2022.

26 3. LVMPD Defendants deposed Plaintiff Emily Driscoll on August 11, 2022.

27 4. LVMPD Defendants deposed Plaintiff Tenisha Martin on August 16, 2022.

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5. LVMPD Defendants deposed Plaintiff Lance Downes-Covington on August 19, 2022.

6. LVMPD Defendants deposed Plaintiff Soldadera Sanchez on August 20, 2022.

7. Plaintiffs deposed Defendant Officer Jordan Turner on October 18, 2022.

8. Plaintiffs deposed Defendant Officer Tabatha Dickson on October 24, 2022.

9. Plaintiffs deposed Defendant Officer Evan Spoon on November 7, 2022.

10. Plaintiffs deposed Defendant Retired Captain Patricia Spencer on November 15, 2022.

11. Plaintiffs deposed Defendant Captain Dori Koren on November 22, 2022.

12. Plaintiffs deposed Defendant Lt. Kurt McKenzie on December 21, 2022.

13. LVMPD Defendants deposed Plaintiff Robert O'Brien on March 24, 2023.

14. Plaintiffs deposed LVMPD Defendants' FRCP 30(b)(6) designee(s) - Lt. Landon Reyes on June 20, 2023.

15. Plaintiffs' Deposition Subpoena to Las Vegas Justice Court per FRCP 30(b)(6) for records related to Defendants' citations and arrests during the 2020 BLM Protests.

16. Plaintiffs' Deposition Subpoena to Las Vegas Municipal Court per FRCP 30(b)(6) for records related to Defendants' citations and arrests during the 2020 BLM Protests.

17. **Plaintiffs will be deposing Defendants' FRCP 30(b)(6) designee(s) (Dori Koren) in March 2024.**

18. **Plaintiffs will be deposing Defendants' FRCP 30(b)(6) designee(s) (John McGrath) in February 2024.**

II. DISCOVERY THAT REMAINS TO BE COMPLETED.

The Parties are actively conducting discovery and have completed the majority of the written discovery and depositions. However, the Parties are continuing to meet and confer on outstanding discovery issues.

The Parties' primary remaining discovery tasks include: (1) Plaintiffs have subpoenaed records from the Las Vegas Municipal Court and Las Vegas Justice Court for documents concerning Defendant's misdemeanor citations and arrests during the BLM

1 Protests in 2020 and are in the process of obtaining records related to the same; (2) resolution
2 of meet and confer issues and motion practice if needed; (3) Plaintiffs' deposition of
3 Defendant Las Vegas Metropolitan Police Department's FRCP 30(b)(6) designee(s); (4)
4 expert disclosures; (5) rebuttal reports; and (6) depositions of the experts.

5 **III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.**

6 This is the **fourteenth** request for an extension of discovery deadlines in this matter.
7 The Parties request that the Discovery Plan and Scheduling Order deadlines be extended an
8 additional ninety (90) days so that the Parties may complete the tasks above and efficiently
9 manage expert disclosures. **This involves waiting for deposition transcripts requiring**
10 **expert review and analysis and Defendants need to supplement their production of Bates**
11 **stamped documents.**

12 The Parties acknowledge that, pursuant to Local Rule 26-3, the Parties must
13 establish that good cause exists to extend the deadlines.

14 The Parties have been diligently conducting discovery and continue to conduct
15 discovery, but an extension is still needed to efficiently conclude discovery and manage the
16 case.

17 Additionally, the parties are continuing to meet and confer with Defendants' counsel
18 regarding the FRCP 30(b)(6) deposition and subpoenas. Meet and confer efforts are ongoing.
19 Plaintiffs have also brought a Motion for Sanctions regarding the failure to activate BWCs,
20 preserve BWC video footage, and/or produce BWC video footage. **The Parties agree that**
21 **supplemental briefing is necessary regarding Plaintiffs' Motion for Sanctions. Plaintiffs**
22 **are waiting for Defendants to produce supplemental Bates stamped documents relevant**
23 **to LVMPD's FRCP 30(b)(6) designees.** Likewise, the experts retained in this matter will
24 also need to review the recent discovery responses, Defendants' supplemental responses (if
25 any), information and documents in response to Plaintiffs' subpoenas to Justice Court and
26 Municipal Court, BWC videos, and all deposition transcripts, including the FRCP 30(b)(6)
27 designees currently scheduled for in or about October due to the schedule conflicts of counsel
28 and the designees, after the current deadline for initial expert disclosures. The Parties are
working with their respective experts to prepare their expert disclosures. However, as noted,

1 the Parties contend that it is more efficient to allow further discovery to be completed before
2 initial expert disclosures to minimize the need for supplementation.

3 **Finally, counsel for Defendants has been ill through December and January,**
4 **which necessitated several medical appointments and required her to be out of the office**
5 **precluding the Parties' ability to conduct depositions in December and January.**
6 **Additionally, counsel for Defendants is anticipated to have surgery on her knee in the**
7 **near future due to an injury she suffered in January. Counsel for Plaintiff has also been**
8 **ill during December and January, including a respiratory illness, and is currently**
9 **recovering from COVID. These circumstances further compound the need for an**
10 **extension of the discovery deadlines.**

11 The Parties thus respectfully request an extension of time to enable them to conduct
12 necessary discovery and so that this matter is fairly resolved on the merits. "Good cause to
13 extend a discovery deadline exists 'if it cannot reasonably be met despite the diligence of the
14 party seeking the extension.'" *Derosa v. Blood Sys., Inc.*, No. 2:13-cv-0137-JCM-NJK, 2013
15 U.S. Dist. LEXIS 108235, 2013 WL 3975764, at 1 (D. Nev. Aug. 1, 2013) (*quoting Johnson*
16 *v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)); see also Fed. R. Civ. P. 1
17 (providing that the Rules of Civil Procedure "should be construed, administered, and
18 employed by the court and the Parties to secure the just, speedy, and inexpensive
19 determination of every action and proceeding"). As the procedural history of this case
20 illustrates, the Parties have been diligent in litigating this matter. Significant written discovery
21 has been exchanged, nearly all depositions are complete, experts are engaged, and counsel
22 continue to meet and confer regarding various topics. Additionally, counsel for the Parties in
23 this matter are litigating several other unrelated matters (including against each other) which
24 have competing demands. While competing demands of litigation are merely one of many
25 reasons for the instant request, it should be noted that the other litigation between the same
26 counsel involving similar issues can only benefit from the completion of discovery in this
27 matter so that in other litigation, similar requests can be expedited and can further the
28 resolution of those matters and the interests of justice. Indeed, counsel for the Parties continue

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to engage in settlement discussions regarding this and the other matters they are litigating that stem from the BLM protests.

Thus, the standards to extend all deadlines, including the expert deadlines, is satisfied here.

Based on the foregoing stipulation and proposed deadlines, the Parties thus respectfully request an extension of time to extend the deadlines in this matter to enable to them to conduct necessary discovery and so that this matter is fairly resolved on the merits.

IV. PLAINTIFFS' MOTION FOR SANCTIONS

On February 1, 2024, the Court issued a Minute Order in Chambers regarding ECF No. 178, the Order Granting Stipulation to Reschedule the December 4, 2023, Motion Hearing and Permit Supplemental Briefing. The Parties have been working to schedule the depositions of LVMPD FRCP 30(b)(6) designees, Dori Koren and John McGrath and Defendants are working to supplement their disclosures with additional Bates stamped documents. The Parties will have a joint status report for the Court on or before Friday, February 9, 2024.

V. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DEADLINES

	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	June 14, 2022	Past/Unchanged
Initial Expert Disclosures	March 5, 2024	May 3, 2024
Rebuttal Expert Disclosures	April 9, 2024	June 7, 2024
Discovery Cut-Off	April 29, 2024	June 28, 2024
Dispositive Motions	June 22, 2024	April 21, 2024
Pretrial Order	July 3, 2024	September 3, 2024 (If dispositive motions are filed, the deadline for shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)

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Based on the foregoing stipulation and proposed deadlines plan, the Parties request that the Discovery Plan and Scheduling Order deadlines be extended an additional sixty (60) days so that the parties may conduct additional discovery, and efficiently manage expert disclosures.

Dated this 9th day of February 2024.

Dated this 9th day of February 2024.

MCLEATCHIE LAW

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Metropolitan Police Department,
Lieutenant Kurt McKenzie, Officer
Tabatha Dickson, Captain Patricia
Spencer, Captain Dori Koren, Officer
Evan Spoon and Officer Jordan Turner

ORDER

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 2/12/2024

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN AND SCHEDULING ORDER DEADLINES (FOURTEENTH REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 9th day of February, 2024.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch

An employee of Marquis Aurbach

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